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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RHONDA TAYLOR MITCHELL,	)	
	)	
Plaintiff,	)	CASE NO. 2:20-cv-01979-DJA
	)	
v.	)	
	)	<b>CONSENT MOTION</b>
	)	<b>FOR EXTENSION OF TIME TO FILE</b>
ANDREW SAUL,	)	<b>PLAINTIFF'S BRIEF</b>
COMMISSIONER OF SOCIAL SECURITY,	)	
	)	
Defendant.	)	
	)	

Plaintiff, Rhonda Taylor Mitchell, by her attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a thirty-six day extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed April 11, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. This, prevents counsel from preparing a proper and meritorious brief. Plaintiff requests this time to allow for review of the record and proper preparation of Plaintiff's Brief. Wherefore, Plaintiff requests an extension from April 11, 2021 up to and including May 17, 2021 to file her brief.

Counsel for the Plaintiff has conferred with defendant's counsel who kindly has no objection to this request.

Dated this 10th day of April, 2021.

Respectfully submitted,

/s/Hal Taylor

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**Plaintiff's Certificate of Service:**

I certify that I caused the Motion for Extension of Time to be served today, April 10, 2021, by CMECF to Chantal Jenkins, who is a filing user of the CMECF system.

/s/Hal Taylor

Hal Taylor, Esq.

**IT IS SO ORDERED.**

DATED: April 12, 2021



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE